

**THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**IN RE:** : **BK. No. 18-18473 ELF**  
**MARGARET CULBERTSON** :  
**Debtor** : **Chapter No. 13**

**PHH MORTGAGE CORPORATION**  
**Movant**

**v.**

**MARGARET CULBERTSON**  
**Respondent**

**NOTICE OF COVID-19 MORTGAGE FORBEARANCE AGREEMENT PURSUANT TO  
LOCAL ORDER 20-3007**

The undersigned, Phelan Hallinan Diamond & Jones, LLP, are creditor's counsel in this matter.

1. Debtor currently has a mortgage with **PHH MORTGAGE CORPORATION**. The property address is 1129 AGNEW DRIVE, DREXEL HILL, PA 19026-1807, Loan # ending in 3892. A Proof of Claim has been filed on the claim register at #1. A Notice of Payment Change/Forbearance is being filed on the claims docket pursuant to bankruptcy Rule 3002.1 (b) and Local Rule 20-3007.
2. The terms of the forbearance are as follows: Regular monthly mortgage payments starting September 28, 2020 through December 27, 2020 are suspended. Payment of the escrow component of the regular monthly mortgage payments shall also be suspended.
3. The Creditor advises that no fees will be assessed against the loan with regard to this Notice of Forbearance.
4. Prior to the expiration of the forbearance period, Debtor must either (1) request additional forbearance time under Local Rule, State or Federal Law; (2) enter into

loss mitigation with Creditor; or (3) file an Amended Chapter 13 Plan which cures the arrears resulting from the forbearance period over the remainder of the Chapter 13 Plan.

5. Creditor, does not waive any rights to collect the payments that come due during the forbearance period or any payments that were due and owing prior to the forbearance period. The payment post-petition amount due at the time of this forbearance is \$1,544.80.
6. Creditor does not waive its rights under the terms of the note and mortgage or under other applicable non-bankruptcy laws and regulations, including, but not limited to, RESPA, and the right to collect on any post-petition escrow shortage.

/s/ Thomas Song, Esquire

Thomas Song, Esq., Id. No.89834

Phelan Hallinan Diamond & Jones, LLP

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October 2, 2020

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**CERTIFICATE OF SERVICE**

I hereby certify that service upon all interested parties, indicated below was made by sending true and correct copies of the Notice of Forbearance by electronic means on October 2, 2020.

WILLIAM C. MILLER, ESQUIRE (TRUSTEE)  
P.O. BOX 1229  
PHILADELPHIA, PA 19105

MARGARET CULBERTSON  
1129 AGNEW DRIVE  
DREXEL HILL, PA 19026

BRAD J. SADEK, ESQUIRE  
1315 WALNUT STREET, SUITE 502  
PHILADELPHIA, PA 19107

UNITED STATES TRUSTEE  
OFFICE OF THE U.S. TRUSTEE  
200 CHESTNUT STREET, SUITE 502  
PHILADELPHIA, PA 19106

/s/ Thomas Song, Esquire

Thomas Song, Esq., Id. No.89834

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